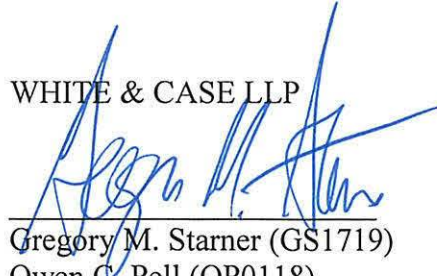


PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendant “BTA Bank” JSC’s Motion to Dismiss or Stay in Favor of Arbitration; the Declaration of Francis Fitzherbert-Brockholes dated April 22, 2014 with the Exhibits thereto; and the Declaration of Gregory M. Starner dated April 22, 2014 with the Exhibit thereto, Defendant “BTA Bank” JSC, by its undersigned counsel, will move this Court before the Honorable Jesse M. Furman at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1105, New York, New York, 10007, for entry of an Order dismissing, with prejudice, the Complaint in this matter in its entirety pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2), and 12(b)(6), or staying this action and compelling Plaintiffs to arbitrate their claims pursuant to the Federal Arbitration Act, 9 U.S.C. §§ 4, 206, 208.

Dated: New York, New York
April 22, 2014

WHITE & CASE LLP

By:



Gregory M. Starner (GS1719)
Owen C. Pell (OP0118)

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